

In Re:
Pamela A. Zook

Case No.: 21-13951/ABA
Chapter: 7
Judge: Andrew B. Altenburg, Jr.

NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY

Joseph D. Marchand, Esquire, Trustee, in this case proposes a compromise, or to settle a claim and/or action as described below. If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

Address of the Clerk: Clerk of the United States Bankruptcy Court
U.S. Post Office & Court House
PO Box 2067, 401 Market Street
Camden, NJ 08101-2067

If an objection is filed, a hearing will be held before the Honorable Andrew B. Altenburg, Jr. on September 21, 2021 at 10:00 a.m. at the United States Bankruptcy Court, courtroom no. 4B, 400 Cooper Street, 4th Floor, Camden, NJ (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

Nature of action: The Trustee having determined that equity existed in the Debtor's interest in the equity in Real Estate located at 228 Allens Lane, Mullica Hill, NJ, over and above costs of administration and exemption, and the Trustee agreeing not to exercise his powers to liquidate the property in exchange for the Bankruptcy Estate being paid a sum of money, and under the terms as stated below.

Pertinent terms of settlement: The Bankruptcy Estate will be paid a sum of \$8,000.00, representing the equity in the above stated Real Estate after considering exemption, costs of sale as well as possible reductions in the sale price from fair market value of said property, which has been determined to be approximately \$215,000.00.

By way of example, if the property sold at \$215,000.00 the following reductions would be effectuated:

Estimated Fair market value:		\$215,000.00
Estimated Real Estate Broker fee:	(-)	\$ 12,900.00
Mortgage Payoff:	(-)	\$160,436.00
Exemption	(-)	<u>\$17,355.97</u>
		\$24,308.03
Trustee's Compensation(on \$197,644.03)	(-)	<u>\$ 13,132.20</u>
		\$11,175.83
Trustee Compensation (added back in on Settlement amount)	(+)	<u>\$ 1,867.50</u>
		\$13,043.37

With reference to the above, considering market risks together with increased administrative costs, the Trustee believes the payment of \$8,000.00 is fair and reasonable.

Debtor agrees to waive any Exemption in said real estate and/or the proceeds from this Settlement.

No sale of the real estate is being effectuated to the Debtor since she already owns a 100% interest in same, and the Trustee is merely not exercising his powers to effectuate a liquidation of the property in lieu of payment as stated above.

The Trustee, the Bankruptcy Estate of Pamela A. Zook, and the Debtor, Pamela A. Zook, hereby generally release each other from any and all claims, demands and causes of action, which may exist by and between the parties for anything that has happened from the beginning of time until now, as to this settlement involving the Real Estate only.

Debtor, Pamela A. Zook, waives all claims against the Trustee and the Bankruptcy Estate of Pamela A. Zook and shall receive no distribution in said case, and shall not file a Proof of Claim in this bankruptcy, nor shall she receive any money with reference to any Exemption as to this settlement involving the Real Estate only.

Settlement is subject to there being no successful objections to the Notice of Settlement of Controversy being forwarded by the Trustee to the Clerk's Office for noticing purposes. If an objection is sustained this settlement is deemed null and void.

Trustee and Attorney for Trustee reserve all rights under Section 506(c) to make application for costs, expenses, and fees.

A full copy of the Stipulation of Settlement has been filed with the Court and is available for review.

Objections must be served on, and requests for additional information directed to:

Name: /s/ Joseph D. Marchand, Esquire, Trustee

Address: 117-119 West Broad Street, P.O. Box 298, Bridgeton, NJ 08302

Telephone No.: (856) 451-7600

rev.8/1/15

In re:
Pamela A Zook
Debtor

Case No. 21-13951-ABA
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0312-1
Date Rcvd: Aug 23, 2021

User: admin
Form ID: pdf905

Page 1 of 2
Total Noticed: 17

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 25, 2021:

Recip ID	Recipient Name and Address
db	+ Pamela A Zook, 228 Allens Lane, Mullica Hill, NJ 08062-2005
cr	+ Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/, 635 Woodward Avenue, Detroit, MI 48226-3408
519284853	Comenity - My BJ's Perks Mastercard, PO Box 650113, Dallas, TX 75265-0113
519209505	Goldman Sachs Bank, USA, PO Box 45400, Salt Lake City, UT 84145-0400
519209507	+ Navient/RKL Fincl Corp, 123 S Justison St, Fl 3, Wilmington, DE 19801-5363
519209510	+ State of New Jersey, Division of Taxation, PO Box 046, Trenton, NJ 08601-0046
519209511	+ Zwicker & Associates, LLC, 1020 Laurel Oak Road, Sute 303, Voorhees, NJ 08043-3518

TOTAL: 7

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
smg	Email/Text: usanj.njbankr@usdoj.gov	Aug 23 2021 20:32:00	U.S. Attorney, 970 Broad St., Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
smg	+ Email/Text: ustpreion03.ne.ecf@usdoj.gov	Aug 23 2021 20:32:00	United States Trustee, Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100, Newark, NJ 07102-5235
519220885	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Aug 23 2021 20:32:00	ACAR Leasing Ltd. d/b/a GM Financial Leasing, P O Box 183853, Arlington, TX 76096-3853
519209502	Email/PDF: AIS.cocard.ebn@americaninfosource.com	Aug 23 2021 20:31:21	Capital One, PO Box 6492, Carol Stream, IL 60197-6492
519209503	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Aug 23 2021 20:32:00	GM Financial, PO Box 181145, Arlington, TX 76096-1145
519209504	+ Email/Text: GMFINANCIAL@EBN.PHINSOLUTIONS.COM	Aug 23 2021 20:32:00	GM Financial, PO Box 183593, Arlington, TX 76096-3593
519209506	Email/Text: sbse.cio.bnc.mail@irs.gov	Aug 23 2021 20:32:00	Internal Revenue Service, PO Box 7346, Philadelphia, PA 19101-7346
519209508	+ Email/Text: bankruptcy@prosper.com	Aug 23 2021 20:32:00	Prosper Funding, LLC, 221 Main Street, Suite 300, San Francisco, CA 94105-1909
519209509	+ Email/Text: bankruptcyteam@quickenloans.com	Aug 23 2021 20:32:00	Quicken Loans, 1050 Woodward Avenue, Detroit, MI 48226-3573
519210093	+ Email/PDF: gecsedl@recoverycorp.com	Aug 23 2021 20:31:21	Synchrony Bank, c/o of PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021

TOTAL: 10

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

District/off: 0312-1

User: admin

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Date Rcvd: Aug 23, 2021

Form ID: pdf905

Total Noticed: 17

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 25, 2021

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 23, 2021 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Quicken Loans LLC dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Denise E. Carlon	on behalf of Creditor Rocket Mortgage LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans, Inc. dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Joseph Marchand	on behalf of Trustee Joseph Marchand jdmarchand@comcast.net jmarchand@comcast.net
Joseph Marchand	jdmarchand@comcast.net jmarchand@comcast.net;jmarchand@ecf.axiosfs.com
Richard S. Hoffman, Jr.	on behalf of Debtor Pamela A Zook rshoffman@hoffmandimuzio.com lmcevoy@hoffmandimuzio.com;jslachetka@hoffmandimuzio.com;hoffmanrr81909@notify.bestcase.com
U.S. Trustee	USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 6